

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
Attorneys for Ditech Financial LLC

IN THE MATTER OF:

Steven J. Bombaro dba Cousins Garden Design, LLC
DEBTOR,

Donna M. Pagano
Joseph R. Pagano

CO-DEBTORS

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 17-34784-JNP

**NOTICE OF MOTION FOR RELIEF
FROM STAY & CO-DEBTOR STAY**

TO:

Steven J. Bombaro dba Cousins Garden Design, LLC
3 Laurel Avenue
Berlin, NJ 08009

Donna M. Pagano
244 South Broadway
Gloucester City, NJ 08030-2341

Joseph R. Pagano
244 South Broadway
Gloucester City, NJ 08030-2341

Eric Clayman
Jenkins & Clayman
412 White Horse Pike
Audubon, NJ 08106

Jeffrey E. Jenkins
Jenkins & Clayman
412 White Horse Pike
Audubon, NJ 08106

Isabel C. Balboa Esq.
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, NJ 08002

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Ditech Financial LLC**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **401 Market Street, P.O. Box 2067; Camden, NJ**, for an Order to Grant Relief from the Automatic Stay & Co-Debtor Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtor and Donna M. Pagano and Joseph R. Pagano, Co-Debtors, have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as

244 South Broadway, Gloucester City, NJ 08030-2341. The hearing on this matter is scheduled for **November 6, 2018 at 10:00 A.M..**

Dated: October 8, 2018

/s/ Denise Carlon, Esq.

Brian C. Nicholas, Esquire

Denise Carlon, Esquire

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Attorney for Ditech Financial LLC